

To: Waste Management Staff

Please take a few minutes to complete this document. You should know that some supervisors may call their staff together to discuss ideas and prepare a response for their Regional Team or Section. Other supervisors may ask you to answer the questions as individuals. We are asking for one or two ideas per question, not an exhaustive list, and suggest spending 30 minutes or less. Please send your response to Jane Washburn by July 25th if possible, but no later than Aug 1.

Waste Management Priorities and Streamlining Ideas July 2003

This response represents (check one and insert initials of Regional Team or Section):

- ☐ _____ Regional Team/Subteam members **NR 507/508 subteam of the Environmental Monitoring team .**
Private Well Subteam, GEMS
- ☐ _____ Section members
- ☐ Individual in _____ Region
- ☐ Individual in _____ Section

Among your work activities, which have the **greatest environmental benefit**?

- 1- 1- Our subteam provides formal guidance and direction to staff and our stakeholders regarding evaluation of monitoring data. This improves data collection, data interpretation and plan review decisions. For example, we wrote formal guidance for when it's appropriate to reduce monitoring near landfills. This guidance stresses that it is important to continue monitoring and discover contamination before it becomes a bigger environmental problem.

The subteam also provides valuable informal guidance to staff. We deal with monitoring issues that plan reviewers don't have time to check out, may not have the knowledge to interpret, and may not even notice as being a problem! For "problem parameters" (such as tetra hydrofuran), we try to figure out why the sampling results are problematic and what to do about it, and alert all the hydros so they can make better plan review decisions.
 - 2- Research on groundwater monitoring parameters that will make monitoring more effective and less polluting. The NR 507 subteam considers changing GWM requirements to include parameters that would monitor landfills as well as or better than existing parameters, but with less environmental degradation. For example, we conducted a study of Chemical Oxygen Demand (COD) because existing COD analytical methods generate mercury waste and COD may not be a useful indicator parameter at some landfills anyway. As a result of this study, our landfills will either drop COD altogether or switch to other, non-polluting parameters such as Dissolved Organic Carbon or VOCs.
 3. Research on monitoring topics that relate to landfill design – Our subteam arranged a study of VOCs which showed that VOCs in groundwater near landfills do not break down and dissipate, therefore, people should not rely on "natural attenuation" as a remedy at sites where there is VOC contamination.
- 1- Plan review/approval is proactive environmental protection, but this hidden value should be emphasized when and where possible.

	<p>1- Code changes in NR 504 & NR812 to address inconsistent rule application of landfill separation distances to private wells during the siting process.</p> <p>2- Application of the new private data notification guidance</p>
Among your work activities, which have the least environmental benefit ?	<p>1-1-Work planning. Exception: the process of prioritizing our projects tends to weed out those of lesser benefit. the NR 507 subteam tries to work on the most important topics first. If a topic doesn't have any environmental benefit, we tend not to work on it at all. We only meet 10-12 hours per year, so we have to stay focused</p>
Among your work activities, which have the greatest value to stakeholders/the public ?	<p>1-1- Our guidance on various aspects of monitoring provides consistency, understanding and sometimes saves money. For example, our guidance "Reducing monitoring near solid waste landfills," protects private well users near old landfills by making it harder for landfill owners to quit monitoring. The guidance also provides a level playing field for consultants and landfill operators, and consistency among DNR plan reviewers. The guidance helps assure that consultants supply to correct information to DNR the first time, enabling DNR to review plans more quickly with less time spend overall.</p> <p>2- Research on monitoring issues. For example our pesticide study, will hopefully demonstrate that certain pesticide parameters are not useful in Wisconsin and could be dropped. This will save landfill operators money without losing any environmental benefit. Another example is our COD study, which determined that most landfill owners could drop COD, which will save them money and eliminate a source of mercury waste, while at the same time, not compromise the quality of landfill groundwater monitoring programs.</p> <p>1- We are working on coordinating the language between NR 812 and NR 504 with regard to the separation distance between existing water supply wells and encroaching landfill (expansions). This will involve coordination between the WA and DG rule-making processes and their respective technical advisory groups. Stakeholders have requested quick resolution because of its affect on the siting process.</p> <p>1- Ensuring that groundwater is correctly monitored, results submitted per approval requirements, and the timely review of submitted data is proactive environmental protection.</p> <p>2- Support to laboratories, consultants, and the general public.</p> <p>3- WEB-based access to GEMS environmental data for the public.</p> <p>4- If automated/Web-based, updated GEMS Schedules & Groups information would be invaluable to the stakeholders/public and laboratories performing data preparation.</p> <p>5- Ensuring groundwater data and NR140 exceedances are shared with and/or turned over to DG when involving private wells</p>
Among your work activities, which have the least value to	<p>1-See above. We have very little time together as a subteam, and do the most important things first. We have important issues we can't</p>

stakeholders/the public?	get to
Among your work activities , which have potential for streamlining, for an innovative regulatory approach or for saving time/money?	<p>1- Almost everything the NR 507 subteam chooses to work on saves time by resolving problems for the program as a whole. We are like consultants for the waste program on environmental monitoring issues. We enable hydrogeologists to concentrate on plan reviews which bring in plan review fees.</p> <p>- The DG regulatory approach to this issue will be streamlined while still preserving the rights of well owners/residents. WA and DG staff will continue to work together to decide whether to grant exemptions/variances.</p> <p>1- Automating data uploading by facilities. The specific changes would require that errors be corrected before the data can be submitted (WM Bureau to apply for NEIEN grant from EPA to develop Web-based system).</p> <p>2- Automated upload of plan approvals to Schedules and Groups.</p> <p>3- Electronic signatures for data certification requirements.</p> <p>4- Modifying upload format and data submittal to tie in with Technical Services' Data Portal (1 single reporting mechanism for stakeholder reporting) and allows for automated checking of data by Dept.</p> <p>5- Automatic notification to assigned DG staff of data uploads and NR140 exceedances by e-mail.</p>
Among work activities in the Waste Management program as a whole , (or elsewhere in the Department), which have potential for streamlining, for an innovative regulatory approach or for saving time/money?	<p>1- Charge fee for manual upload by Dept. staff of all point/well locational information, including well construction, abandonment, and status changes.</p>

If you have additional suggestions or comments on this subject, please include them below. Thanks!

1. The NR507 subteam of the EMT wishes to note that Donalea Dinsmore has been invaluable to our team. She has enabled us to be very productive and practical. Specifically, her contributions were these:

- Donalea's knowledge about sampling, analysis, QA/QC and other laboratory issues far surpassed what any of our Waste program hydros and subteam members possesses. She was able to explain these complex and dynamic issues in terms we could understand.
- By active listening, she helped us determine what we want and how to accomplish it.
- She communicated to certified labs on our behalf.
- She wrote the final version of the COD study, and greatly clarified its content and recommendations.
- She periodically examined our data to find out about "problem parameters" and was able to recommend solutions or at least clarify our questions.
- She was in a position to write rules for standardizing sampling and analysis; now that she is gone, we are stuck with NR 507's outdated list of required sampling methods and parameters, which are unlikely to be revised for years.

Donalea's position was recently eliminated. We don't know what we will do without her. Please ensure that we have someone who understands sampling QA/QC to take her place on our subteam. We would gladly take her back.

2. This program loses institutional memory every time someone retires. There needs to be a more concerted effort to commit unwritten policy to written policy, **hence the need for a subteam like ours that reduces work for everyone**. The remaining staff spend way too much time trying to determine how things were done in the past. This doesn't work with a decentralized organization. Because of the current structure it can take years to get guidance out.

For the innovative streamlining part - we need single tables for each of our applications to reference - i.e. license table, contact table for FIST, SHWIMS, GEMS, Recycling.